



Ex Parte Presentation of GreatCall, Inc.  
WC Docket No. 09-197

January 13, 2011

# Introductions

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- **Dean Williams**
  - Vice President of Technology
  - Employed by GreatCall since 2006
  
- **Carol Morabito**
  - Manager, Government Programs
  - Employed by GreatCall since 2008

# Description of GreatCall Service

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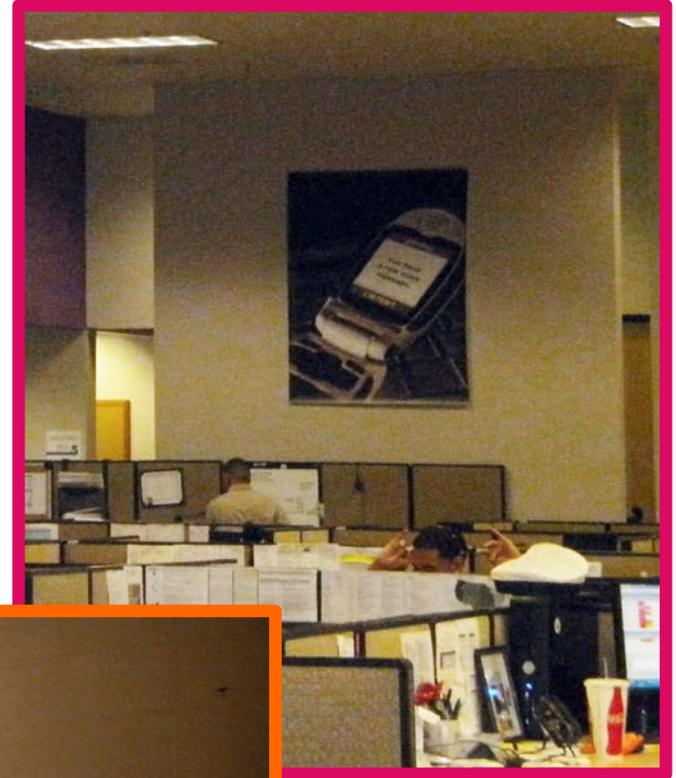
- GreatCall has offered service using the Jitterbug brand name since 2006.
- A nationwide provider of wireless services.
- Unique handsets built exclusively for Jitterbug users.
- High touch “concierge” service simplifying wireless usage.
- Unique offerings catering to elderly and users seeking simple to use wireless service.

# Unique Offerings

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- Customers may call 24/7 U.S. based operator assistance to:
  - Have names and phone numbers added to their phone list
  - Receive directory assistance and assistance completing calls
  - Be connected to contacts in their phone list or other requested numbers
  - Add calendar entries
- Customers may select from a growing set of specialized health and safety applications, including:
  - Live Nurse
  - Medication Reminders
  - Check-in Calls

# GreatCall Call Center—Carlsbad, CA



# GreatCall's Facilities

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- GreatCall provides operator services (Including directory assistance), customer care, technical support, and telesales through its own facilities.
- Call Center Facility
  - Located in Carlsbad, CA
  - ~40,000 square feet
  - ~300 employees
  - All computers, network infrastructure, and telephone equipment is owned and maintained by GreatCall.
- Nationwide coverage provided by roaming agreements with national and regional CDMA carriers.
- 85% of customers served by Verizon network. 15% of Jitterbug subscribers remain on GreatCall's affiliated network. All customers access GreatCall's operator/directory assistance services.

# Petitions for ETC Status Pending at the Commission

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- GreatCall has filed nine petitions for ETC status at the FCC, proposing to provide service throughout eight states and the District of Columbia.
- Pleading cycle has closed.
- Comments discuss statutory definition of facilities-based service and FCC's rulings.

# GreatCall is a Facilities-Based Carrier and its ETC Applications Do Not Require a Petition for Forbearance

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- A carrier providing service through a combination of facilities and resale meets the requirement of Section 214(e).
- GreatCall provides two of the nine supported services through its own facilities.
- Commenting parties asking the FCC to require a petition for forbearance seek only to delay market entry by well-positioned competitors.
- GreatCall's application should be processed the same as any other facilities-based carrier.

# The FCC Has Provided Specific and Relevant Guidance on What Constitutes Facilities-based Service

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- “We conclude, therefore, that, if a carrier uses its own facilities to provide at least one of the designated services, and the carrier otherwise meets the definition of “facilities” adopted above, then the facilities requirement of section 214(e) is satisfied. ***For example, we conclude that a carrier could satisfy the facilities requirement by using its own facilities to provide access to operator services, while providing the remaining services designated for support through resale....***Section 214(e) does not mandate the use of any particular level of a carrier's own facilities.”

*Report and Order, 12 FCC Rcd at 8870-71 (1997).*

- By offering operator services and directory assistance through its own facilities, GreatCall is providing facilities-based services “through a combination of its own facilities and resale” in full compliance with Section 214(e).



Thank You!

Questions?